

Commissioners,

I am writing to express my concerns over recent comments by the ARRL and Steve Waterman urging the FCC to approve the use of wideband digital modes, specifically PACTOR-4, without limitation in the HF amateur bands. Justification for this is its recent usage following major hurricane damage in Puerto Rico. I believe both of the above referenced commenters are using a “never let a crisis go to waste” mindset as justification for advancing an agenda to prioritize the HF amateur bands for emergency communication at the expense of the vast majority of amateur radio licensees - especially narrowband and weak signal users of popular modes such as CW, WSPR, WSJT, and FT8. While critical during natural and man-made disasters, emergency communication is only one of the several stated purposes of amateur radio. The current practice of granting a temporary authorization to use otherwise prohibited modes seems very adequate and I see no pressing need to grant blanket authority.

I am an amateur extra class licensee holding the call sign K0RGI - formerly KA9VHG. I've been licensed since 1986 and have experience with WinLink on VHF and HF amateur bands. My usage has been with AX.25 packet on VHF and PACTOR on HF. This early version of PACTOR did not require proprietary - and very expensive - modems but was considerably slower than the more recent PACTOR-4. Nonetheless, it worked quite well for passing error-free messages from point to point and was a valuable addition to the amateur radio communication arsenal.

With my past experiences as a guide, I do not consider WinLink and PACTOR-4 to be a significant problem when used appropriately. However, interference occurs when WinLink stations are set up for automatic operation without listening for an existing transmission, and they often are. It's very common to be carrying on a conversation on the air using, for example, PSK31 on 14.070 MHz and have an automated station start up on your frequency, in violation of both the rules and common courtesy. Allowing a wideband mode such as PACTOR-4 free rein on the bands would essentially destroy their usefulness for what amateur radio operators typically do.

I've previously provided comments in support of RM-11708 to delete the current symbol rate limits and allow a maximum bandwidth for data emissions of 2.8 KHz. In those comments, I expressed that usage should be restricted to sub bands that currently support wideband modes such as SSB. I still believe that to be a practical solution to the occasional need for HF emergency communications in disaster areas. Under no circumstances do I support usage in the sub bands currently used for narrowband modes.

An additional comment filed by the ARRL regarding stalled legislation known as the Amateur Radio Parity Act of 2017 seeks to use the same “never let a crisis go to waste” mentality to prod the FCC into taking action on its own to allow amateur radio antennas in HOA controlled communities. This legislation is deeply flawed and I do not support it in its current form. It is skewed heavily toward HOAs, would allow their capricious denial of even minimally effective antennas based upon purely subjective criteria such as perceived aesthetics and their own definition of effective, and would classify current stealth antenna installations as a violation of Federal law if permission to erect from

the HOA is not sought. As such, I do not support the ARRL comments regarding antennas and HOAs and I urge the commissioners to reject the ARRL request to take action on its own unless these and other flaws detrimental to the amateur radio service are corrected by the Commission.

Respectfully,

James Anderson, K0RGI